

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION

Federal Trade Commission,

Plaintiff,

v.

iBackPack of Texas, LLC, and  
Douglas Monahan,

Defendants.

Case No. 3:19-cv-00160

Judge Jeffrey V. Brown

Magistrate Judge Andrew M. Edison

**JOINT MOTION FOR ENTRY OF STIPULATED ORDER  
FOR PERMANENT INJUNCTION AND MONETARY JUDGMENT**

Plaintiff, the Federal Trade Commission (“FTC”), and Defendant Douglas Monahan jointly move this Court for entry of the attached Stipulated Order for Permanent Injunction and Monetary Judgment (“Stipulated Final Order”), which would resolve the FTC’s claim against Monahan. In support of this motion, the FTC and Monahan state as follows:

1. The FTC filed its Complaint for Permanent Injunction and Other Equitable Relief on May 6, 2019, alleging that Monahan had violated Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).
2. The Stipulated Final Order has been signed by Monahan, who is appearing *pro se*. The Stipulated Final Order also has been approved by the FTC’s Commissioners and signed by counsel for the FTC.

WHEREFORE, Plaintiff FTC and Defendant Monahan respectfully request that the Court enter the Stipulated Final Order.

Pursuant to Local Rule 7.1, the parties conferred on the relief sought by the motion, which is jointly supported.

A proposed order is submitted with this motion.

Respectfully submitted,

Dated: May 11, 2020

/s/ Patrick Roy  
Patrick Roy, Attorney-in-Charge  
D.C. Bar # 1023521  
S.D. Texas (admitted *pro hac vice*)  
proy@ftc.gov

Daniel O. Hanks  
D.C. Bar # 495823  
S.D. Texas (admitted *pro hac vice*)  
dhanks@ftc.gov

Federal Trade Commission  
600 Pennsylvania Ave NW, CC-10232  
Washington, DC 20580  
202-326-3477 (Roy); -2472 (Hanks)  
Facsimile: 202-326-3768

Attorneys for Plaintiff

/s/ Douglas Monahan  
Douglas Monahan  
douglas.monahan@ibackpack.net

Defendant, appearing *pro se*

**CERTIFICATE OF SERVICE**

I, Patrick Roy, an attorney, hereby certify that on May 11, 2020, I caused to be served true copies of the foregoing Joint Motion for Entry of Stipulated Order for Permanent Injunction and Monetary Judgment through the CM/ECF System and by e-mail.

/s/ Patrick Roy  
Patrick Roy  
Federal Trade Commission  
600 Pennsylvania Avenue, N.W.  
Washington, D.C. 20580  
Phone: (202) 326-3477  
proy@ftc.gov

Attorney for Plaintiff  
Federal Trade Commission